

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

MAXIE MCNABB,

Plaintiff

V.

SANDERS LEAD COMPANY, INC.

Defendant.

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**CIVIL ACTION NO:
2:06-0664-MHT**

PLAINTIFF'S PROPOSED VOIR DIRE QUESTIONS

1. Do any of you know the Plaintiff in this case: **Maxie McNabb**
2. Do any of you know any employees of the Defendant in this case:
Sanders Lead Company, Inc.
3. Do any of you know any of the following people who may be witnesses in this case: **Anne Baker, Joe Owens, Sam Kitchens, Leon Bennett, Ricky Brewer, Edgar Fannin, Bart Sanders, Nicholas O'Brian Williams, Randolph E. Harley, III, Robert E. Brundidge, Jr., Bobby Taylor Streeter, Timothy Rayborn, Anthony L. Duncan, and Edward Meadows**
4. Have any of you, or any member of your family, ever been an employee of the defendant in this case: **Sanders Lead Company, Inc.**

5. Have any of you ever had a position with a company which gave you the authority to hire, promote/reclassify, suspend, terminate or make other personnel decisions?
6. Have any of you ever owned your own business?
7. Have any of you ever operated a business for someone else?
8. Have any of you ever worked for a personnel department of any company?
9. Have you ever resigned from a job?
10. Have you ever been terminated or laid off from a job?
11. Have you ever been suspended from a job?
12. Are there any organizations (other than religious) in which you or your spouse are due paying members?
13. Does anyone believe that discrimination claims in general are untrue or blown out of proportion?
14. Does anyone think that the lawmakers have gone too far in making laws to regulate how people are treated at work based on their age?
15. Does anyone here have feelings or thoughts against giving people financial compensation for injuries that they suffered?
16. Does anyone here have feelings or thoughts against giving people

financial compensation for emotional and psychological trauma they have suffered?

17. Is there anyone here who, if the evidence so warrants, will have difficulty awarding money damages against the Defendant: **Sanders Lead Company, Inc.**
18. Have you personally met the lawyers for the Defendant or anyone else you may believe to be associated with them?
19. Is there anyone here who for any reason (religious, philosophical, etc.) does not feel that he or she can sit and decide or “judge,” this case without prejudice toward the Plaintiff or his attorneys?
20. Do you believe that there are jobs people over 50 cannot or should not do?
21. Have any of you ever been involved in a charge of discrimination that was made at your place of employment or filed against your employer with the Equal Employment Opportunity Commission?
22. Have any of you ever been accused of discrimination against an employee at your place of work under any circumstances?
23. Is there anyone here who believes he or she will feel uncomfortable sitting on this case because it is a age discrimination and retaliation

case?

24. Have you or any member of your family ever been a Defendant in a lawsuit, if so, what was the outcome of the case?
25. Have you or any of your close friends or family ever responded to a Charge of Discrimination or provided an agency with information in connection with a Charge?
26. To each individual juror: What are the two most important issues to you in your life?
27. To each individual juror: What are the two most serious problems facing our society today?
28. Do you believe that Congress has gone too far in protecting individuals at work for opposing discrimination?

Respectfully submitted,

/s/Roderick T. Cooks
Roderick T. Cooks
Lee Winston
Counsel for Plaintiff

OF COUNSEL:

WINSTON COOKS, LLC

The Penick Building

319-17th Street North

Birmingham, AL 35203

Tel: (205)502-0970

Fax: (205)251-0231

email: rcooks@winstoncooks.com

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing document on all persons listed below by CMF/Electronic Mail and/or U. S. Mail, postage prepaid and addressed to them as follows:

Matthew M. Baker, Esq.

Cervera, Ralph & Reeves, LLC

P.O. Box 325

914 South Brundidge Street

Troy, Alabama 36081

(334) 566-0116

Done this the 13th day of November, 2007.

/s/Roderick T. Cooks
Of Counsel